



**Permitting and Compliance Division's (PCD)
Public Water & Subdivisions Bureau (PWSB)
and the
Enforcement Division (ENFD)**

PWS Enforcement Action Tracking System (PEATS)

M0 – PROJECT CHARTER



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1) **Agency Mission and Goals & Objectives**

a) **Agency Mission**

The Department of Environmental Quality's (DEQ) mission is to protect, sustain, and improve a clean and healthful environment to benefit present and future generations.

b) **PCD/PWS Goals & Objectives**

The Public Water Supply and Subdivisions Bureau regulates public drinking water and subdivision facilities in Montana. The Bureau's Public Water Supply (PWS) Program assures that public health is maintained through a safe and adequate supply of drinking water. These functions are achieved by technical reviews, licensing, certifications, compliance monitoring, training and technical assistance. The Operator Certification Section licenses operators of Community and Non-Transient Non-Community public drinking water and wastewater treatment facilities. The Bureau's PWS Engineering reviews and approves plans submitted for public drinking water and wastewater systems and the Subdivision Review Section reviews applications for proposed subdivisions to ensure compliance with the Sanitation in Subdivisions Act.

Goals and Objectives:

- Provide technical review and approval of public drinking water and wastewater system design and operational plans,
- Conduct sanitary surveys of public drinking water systems and provide technical assistance to help systems maintain compliance,
- Monitor and oversee required public drinking water system sampling to assure the delivery of safe water to the users of the system,
- Maintain a comprehensive record system for public drinking water and wastewater systems,
- Provide training and certification for operators of drinking water and wastewater systems,
- Ensure that all public water system facilities are properly sited, designed, maintained, and operated in compliance with all permit conditions and state laws and rules,
- Verify adequacy of water supplies for proposed subdivisions,
- Review and approve technical designs for water supply systems and subsurface wastewater treatment systems for proposed subdivisions,
- Review and approve storm water drainage plans for proposed subdivisions, and
- Conduct water quality non-degradation analyses for nitrate and phosphorous discharged from subsurface wastewater treatment systems at proposed subdivisions.
- Conduct sanitary surveys of public drinking water systems and provide technical assistance

- c) The Enforcement Division manages DEQ's enforcement activities. This involves investigating spills and citizen complaints that allege impacts to human health or the environment; processing enforcement cases, and monitoring compliance. The Enforcement Division consists of the Case Management Bureau, the Complaint Management Section, and administrative support services.

Goals and Objectives:

- Ensure that the public and the regulated community maintain compliance with Montana laws and regulations through effective enforcement.
- Investigate spills and citizen complaints that allege a violation of laws and regulations administered by DEQ to determine if a violation has occurred.
- Respond to citizen complaints and spill reports within 30 days of receipt and resolve within 90 days.
- Implement timely, consistent, and appropriate enforcement of laws and regulations administered by the Department
- Issue administrative orders or file judicial complaints within 120 days of an approved enforcement request.
- Manage enforcement cases and monitor compliance with Department orders.

2) **Business Strategy Fit**

Business Process Reengineering: Given the current economic trend, programs throughout DEQ and other Agencies are being asked to consider evaluation of their business processes to reduce the demand on existing staff, improve response time to public inquiries and requests, and reduce overall costs. The PEATS project is strategically aligned with that vision.

The goal of the project is to create a bi-directional flow between the State Drinking Water Information System (SDWIS) and Consolidated Environmental Data Acquisition and Retrieval System (CEDARS) Enforcement databases to comply with data standards and improve the data quality of the SDWIS and CEDARS databases, and expedite the reporting of compliance violation data to the EPA.

This project is strategically aligned with DEQ's Information Technology Plan in the following areas:

1. ITG 01 – Improve Customer Service/Partnerships
2. ITG 03 – Effective Resource Management
3. ITG 04 – Utilize IT to enhance DEQ operational efficiency
4. ITG 05 – Informed Decision Making

3) **Background**

An Enforcement Request is compiled for review by a PWS Rule Manager when a Public Water System is out of compliance and needs to be referred to DEQ's Enforcement Division. The PWS Rule Manager contacts the PWS Compliance Officer with the SDWIS Water System Identifier and the corresponding violation number(s) that will be referred to the Enforcement Division. The PWS Compliance Officer:

- a) Fills out the Enforcement Request (ER) manually with pertinent SDWIS data.
- b) Compiles additional information from the Montana Secretary of State site to determine the Registered Principal and the Registered Agent.
- c) Verifies the latitude/longitude coordinates and determines the Township/Range/Section information.

Once the ER is completed, all relevant supportive documentation (e.g., last Sanitary Survey, any correspondence with the water system, violation letters, etc.) is printed and attached to the request. An internal PWS Enforcement Request (ER) Chain of Custody Form is attached to the front of the packet and routed to obtain the following internal signatures from the PWS Program: Rule Manager, Compliance Officer, Program Manager and Bureau Chief. Once the ER Chain of Custody Form has been approved and signed, it is returned to the PWS Compliance Officer for review. The PWS ER is then forwarded to the Permitting and Compliance Division Administrator for approval signature.

The ER is then forwarded to the Enforcement Division to be entered into the CEDARS Enforcement database. After the assigned Environmental Enforcement Specialist completes the case screening phase, the Enforcement Division Administrator meets with DEQ's Legal staff and DEQ's Director, and if approved, obtains their signatures. When the ER has been approved by the DEQ Director, the Enforcement Division provides a copy of the request to the PWS Compliance Officer.

4) **Project Scope**

This project will provide the following deliverables:

1. User Interface for entering, storing, retrieving, relating and reporting Public Water System Non-Compliance Violations within PEATS;
2. Ability to track DEQ signature approvals;
3. Extract all violations from SDWIS for a Public Water System;
4. Insert new and updated SDWIS Violations into CEDARS Enforcement data base;
5. Extract all enforcement activity performed on a SDWIS Violation(s) from the CEDARS Enforcement data base; and
6. Insert new and updated enforcement actions in SDWIS.

5) Project Objectives

- a) Provide DEQ SDWIS Enforcement Action Tracking System (PEATS)
- b) Implement new data quality audit policies and procedures
 - i) Reduce data entry errors by approximately 20% of the current 9.2% error rate and reduce the time required to process the data by 10% through means such as:
 - (1) Electronic processing of data;
 - (2) Table driven translation of SDWIS Violation Codes to CEDARS Enforcement Codes;
 - (3) Table driven translation of CEDARS Enforcement Codes to SDWIS Violation Codes; and
 - (4) Automated update of SDWIS Compliance Violations that have been referred to the Enforcement Division.
 - ii) Track signature approval of PWS Enforcement Request packet
- c) Provide timely reporting of SDWIS Water System Compliance Violation to EPA
 - i) Electronic processing of data via SDWIS FedRep Application

6) Project Scope Exclusions

- a) Change SDWIS or CEDARS database structures

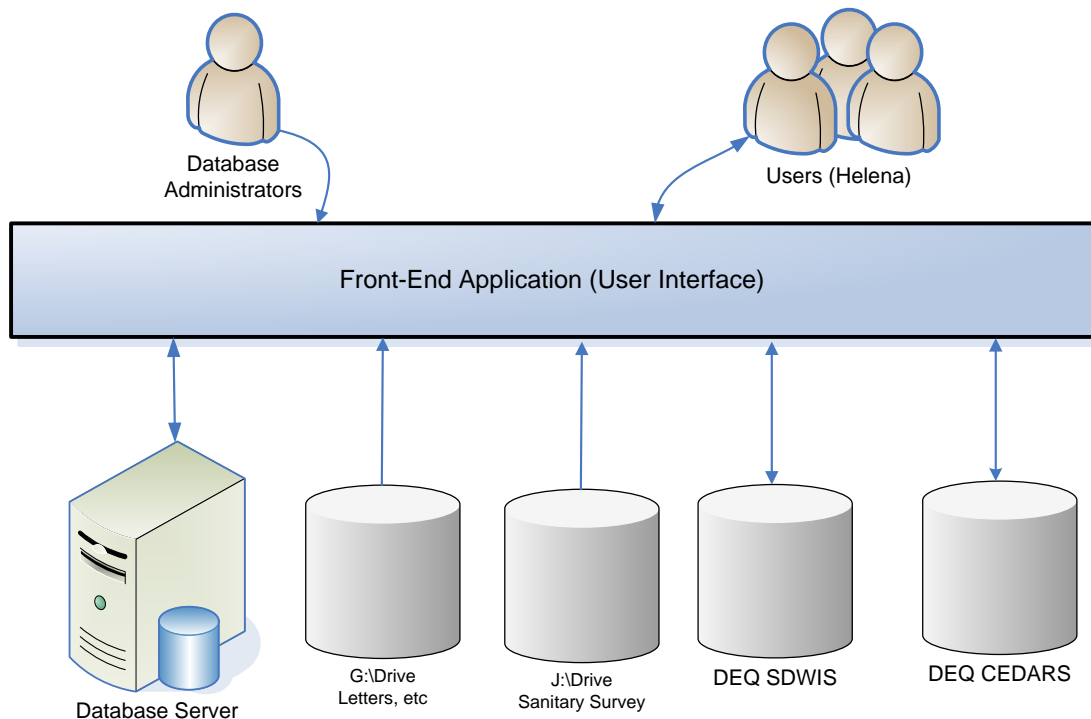
7) Business Process Improvement Opportunities

The expected Business Process Improvement opportunities of this project include:

- a) Quality:
 - i) Improvement in the quality and delivery of the existing DEQ PWS data to stakeholders; and
 - ii) Improve the internal audit and data quality business practices of the DEQ PWS
- b) Data Flow:
 - i) Development of PEATS Interface between SDWIS and CEDARS Enforcement;
 - ii) Creation of SDWIS Violation Flow to CEDARS Enforcement; and
 - iii) Creation of CEDARS Enforcement flow to the SDWIS Data Bridge

8) Draft Architectural Overview

The following is a high-level view of the possible project architecture. Refinement and details will be completed during the Requirements, Design, and Contract phase of the project (i.e., M1/M2.)



9) **Budget Analysis**

The budget for this project has yet to be determined. DEQ anticipates the budget will be determined during the M1/M2 Solution Requirements and Design.

10) **Schedule Objectives / Timing**

The following identifies the high-level project schedule:

- a) **M0 Charter:** October 2012
- b) **M1 Requirements:** November 2012
- c) **M2 Design:** TBD based on the detailed requirements and design
- d) **M3 Development:** TBD based on the detailed requirements and design
- e) **M4 Test:** TBD based on the detailed requirements and design
- f) **M5 Limited Launch:** No later than March 2014
- g) **M6 Full Production:** No later than April 2014

11) **Performance Objectives**

- a) The success of the project will be measured by the:
 - i) Formalized data flow partnership between PCD/PWS, SDWIS/State Compliance Data and Enforcement Division for enforcement actions;

- ii) Reduce the amount of time to enter DEQ enforcement actions into the PWS SDWIS/State Compliance Data;
- iii) Improve internal audit and data quality business practices of PWS SDWIS/State Compliance Data;
- iv) Improve the timeliness and accuracy of addressing priority systems; and
- v) Improve timeliness and accuracy of drinking water data to public and EPA
 - (1) Currently data is received on the 10th and 25th of each month from CEDARS Enforcement,
 - (2) Future daily feed from CEDARS Enforcement to SDWIS/State and vice versa, and
 - (3) Improve decision-making through the inclusion of quality and timely compliance data for -field personnel when conducting inspections

12) Key Resources & Associated Roles & Responsibilities

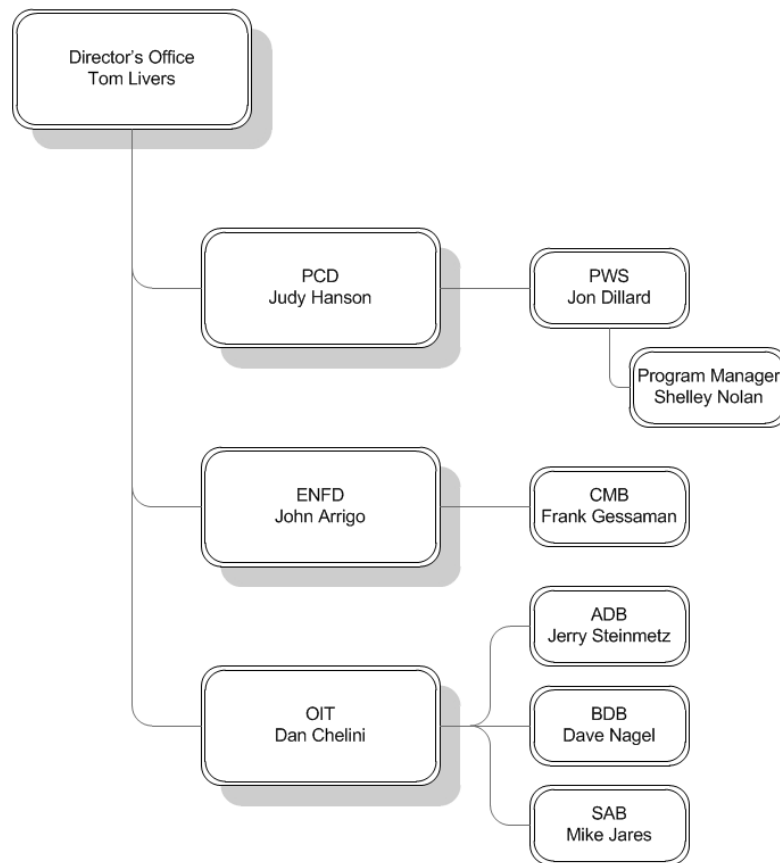
This section will address the various groups/resources chartered to support this project including: the project **Steering Committee**, **Core Project Team**, **Extended Team**, **Project Stakeholders**, and **Support Organizations**.

Note: Associated **Roles & Responsibilities** are defined in detail in Attachment 1.

a) Project Steering Committee:

- i) The Steering Committee will be responsible for approving each Milestone within the project (i.e., M0 – M1), and granting permission to advance to the next Milestone.

Name	Role
Judy Hanson	PCD Division Administrator
Dan Chelini	DEQ CIO
Jon Dilliard	PWS Bureau Chief
Shelley Nolan	PWS Program Manager
Dave Nagel	Business Development Bureau Chief
Jerry Steinmetz	DEQ Application Development Bureau Chief
Mike Jares	DEQ System Administration Bureau Chief
John Arrigo	Enforcement Division Administrator
Frank Gessaman	Enforcement Division Case Management Bureau Chief



b) Core Project Team (*)

Core Team Member	Discipline
Shelley Nolan	PWS Program Manager
Andrea Vickory	Subject Matter Expert (SME)
Steve Martin	SME, Data Manager
Jason Newton	Bureau Systems Analyst (SA)
Melissa Levens	SME, Database Manager
TBD	Vendor

* Other staff may be added as needed to the team throughout the life of the project.

c) Extended Team:

Extended Team Member	Discipline
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Extended Team Member	Discipline
Jerry Steinmetz	OIT/ADB Bureau Chief, Grants Management
Cynthia Dingman	OIT/BDB Quality Control
Kelly Hanna	OIT/ADB Application Development Supervisor
Frank Gessaman	ENFD Case Management Bureau Chief
Dave Nagel	OIT/BDB Bureau Chief, Project Oversight,
Lloyd Stevens	PCD/PWS SME, Compliance Officer

d) Project Stakeholders:

Organization	Role on the Team
Director's Office	Users
Enforcement Division	Users
Permitting & Compliance Division	Users
Office of Information Technology	Oversight

13) Assumptions

- a) IT solution incorporating a workflow system for the existing manual approval process will be included, and
- b) Migrate existing non-completed enforcement request into solution system

14) Project Constraints

- a) Grant funding will be leveraged
 - i. 1st grant end date is June 2013
 - ii. 2nd grant end date is August 2014

15) Risks

- a) The "**Level of Risk**" is assessed based on both the **Impact** and the **Probability** of the Risk.
- b) The following **Probability/Impact Matrix** was used to calculate the associated "**Level of Risk**".

Level of Risk				
Impact		Low (3)	Medium (6)	High (9)
	High (9)	27	56	81
	Medium (6)	18	36	56
	Low (3)	9	18	27
Probability				

Score	Probability/Impact	Overall Project Risk
81	High Probability/High Impact	High
56	High Probability/Medium Impact	Medium High
56	Medium Probability/High Impact	Medium High
36	Medium Probability/Medium Impact	Medium
27	High Probability/Low Impact	Medium
27	Low Probability/High Impact	Medium
18	Medium Probability/Low Impact	Medium Low
18	Low Probability/Medium Impact	Medium Low
9	Low Probability/Low Impact	Low

Risk	Level of Risk
Loss of funding, 1 st grant (8/31/2013)	High
Loss of funding, 2 nd grant (8/31/2014)	Medium
Inadequate staffing levels	Low
Finalization of detailed requirements	High
Inadequate testing strategy, resources and procedures	Low
Project team not empowered	Low
Post implementation support requirements not clearly defined	Medium
Inadequate training could result in unnecessary loss of productivity by staff	Low

16) Issues

Issues	Requires Steering Committee Action
Securing Project Manager in a timely fashion	No
Securing Technical Support in a timely fashion	No
Challenge of aligning expectations across organizations	No

17) Success Measures

- a) Creation of process flows
 - i) SDWIS Violation to CEDARS Enforcement;
 - ii) CEDARS Enforcement to SDWIS Data Bridge;
- b) Development of PEATS Interface between SDWIS and CEDARS Enforcement;
- c) Reduce data entry errors by approximately 20% of the current 9.2% error rate; and
- d) Reduce the time required to process the data by 10%
 - i) Electronic vs. paper processing

18) Project Management

This project will follow the prescribed DEQ Project Management Methodology. There are seven steps/Milestones in this strategy... at each Milestone; there will be a Stakeholder Meeting to secure approval to proceed to the next step.

- a) M0 – Charter
- b) M1 – Contract/Requirements
- c) M2 – Solution Design
- d) M3 – Solution Development
- e) M4 – Solution Test
- f) M5 – Limited Production
- g) M6 – Full Production

The Project Charter should be accepted before work begins. All decisions on changes to the scope/project plan will be made as a team.

19) Document History

Version	Date	Modified by	Reviewed by	Changes
1.0	7/14/2011	Jason Newton	Core Team, Dave Nagel, Pam Osnaya, Cynthia Dingman	Initial Issuance
1.1	7/24/2011	Jason Newton	Core Team, Pam Osnaya	Continue refinement of M0
1.2	7/26/2011	Jason Newton	Core Team, Dave Nagel, Cynthia Dingman	Continue refinement of M0
1.3	7/28/2011	Jason Newton	Core Team	Continue refinement of M0
1.4	7/30/2011	Jason Newton	Core Team	Continue refinement of M0
1.5	8/1/2011	Jason Newton	Core Team	Continue refinement of M0
1.6	9/27/2012	Dave Nagel		

20) Project Charter Approvals

Project Name: PEATS	Date Delivered: TBD
Description of Deliverable: PEATS M0 Project Charter	

The undersigned agree that the above has been satisfactorily delivered.

Signatures of Deliverable Acceptance		
PCD Division Administrator:	Print Name: Judy Hanson	Date: / /
PWS Bureau Chief:	Print Name: Jon Dilliard	Date: / /
PWS Compliance Section Supervisor:	Print Name: Shelley Nolan	Date: / /
DEQ CIO:	Print Name: Dan Chelini	Date: / /
DEQ Business Development Bureau Chief:	Print Name: Dave Nagel	Date: / /
DEQ Application Development Bureau Chief:	Print Name: Jerry Steinmetz	Date: / /
DEQ Systems Administration Bureau Chief:	Print Name: Mike Jares	Date: / /
DEQ Enforcement Division Administrator	Print Name: John Arrigo	Date: / /
DEQ Enforcement Division Case Management Bureau Chief	Print Name: Frank Gessaman	Date: / /

If deliverable does not conform to documented specifications, EXCEPTION approval is necessary

Exception raised by:			
Current Project Phase:			
Description of Project/Work Exception Situation:			
Has the Project/Work been stopped pending resolution of the Exception?			<input type="checkbox"/> Yes <input type="checkbox"/> No
Describe the Exception Plan: How the Exception is to be resolved (may be more than one option)			
Are Any Concessions Required From MTW?	<input type="checkbox"/> Yes <input type="checkbox"/> No	Date:	Concession No.:
Describe Concession (include reason for concession):			
Signatures Of Acceptance of Concessions			
PCD Division Administrator:	Print Name: Judy Hanson	Date: / /	
PWS Bureau Chief:	Print Name: Jon Dilliard	Date: / /	
PWS Compliance Section Supervisor:	Print Name: Shelley Nolan	Date: / /	
DEQ CIO:	Print Name: Dan Chelini	Date: / /	
DEQ Business Development Bureau Chief:	Print Name: Dave Nagel	Date: / /	
DEQ Application Development Bureau Chief:	Print Name: Jerry Steinmetz	Date: / /	
DEQ Systems Administration Bureau Chief:	Print Name: Mike Jares	Date: / /	
DEQ Enforcement Division Administrator	Print Name: John Arrigo	Date: / /	
DEQ Enforcement Division Case Management Bureau Chief	Print Name: Frank Gessaman	Date: / /	

Attachment 1: Project Roles & Responsibilities

Attachment 1: Project Roles and Responsibilities

a) (R=Responsible, A=Accountable, S=Support, C=Consult, and I=Inform):

Tasks/Activities		Team Members									
		Project Manager (TBD)	Core Team (*)	App Dev Super	DEQ OIT SAB (Jares)	DEQ OIT Security (Jares)	DEQ BDB (Nagel)	System Analyst(s)	Lead Developer	Steering Committee	Program Mgr (Nolan & Dilliard)
Project Manager (PM)	Project Manager										
	Issues										
	Identification	A/R	R	R	R	R	R	R	R	I	R
	Resolution	A/R	R	R	R	R	R	R	R	I	R
	Risks										
	Identification	A/R	R	R	R	R	R	R	R	I	R
	Assessment	A/R	R	I/C	I/C	I/C	IS/C	I/C	I/C	I	I/C
	Lessons Learned										
	Identification	A/R	R	R	R	R	R	R	R	I	R
	Assessment	A/R	R	I/C	I/C	I/C	IS/C	I/C	I/C	I	I/C
	Charter										
	Draft/update Charter and conduct Team Review(s) as required until Final	A/R	I/C	I/C	I/C	I/C	IS/C	I/C	I/C	I	I/C

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Tasks/Activities		Team Members									
		Project Manager (TBD)	Core Team (*)	App Dev Super	DEQ OIT SAB (Jares)	DEQ OIT Security (Jares)	DEQ BDB (Nagel)	System Analyst(s)	Lead Developer	Steering Committee	Program Mgr (Nolan & Dilliard)
	Roles & Responsibilities (RASCI)	A/R	I/C	I/C	I/C	I/C	IS/C	I/C	I/C	I	I/C
	Communication Plan	A/R	I/C	I/C	I/C	I/C	IS/C	I/C	I/C	I	I/C
	Security Plan	A	I/C	I/C	I/C	R	IS/C	I/C	R	I	R
	Project & Team Management										
	Project Plan & Project Tasks	A/R	R	R	R	R	R	R	R	I	R
	Host/Facilitate Weekly Team Meetings	A/R	I/C	I/C	I/C	I/C	IS/C	I/C	I/C	I	I/C
	Readiness Review Checklist	A/R	I/C	I/C	I/C	I/C	IS/C	I/C	I/C	I	I/C
	Post Production Review	A/R	I/C	I/C	I/C	I/C	IS/C	I/C	I/C	I	I/C
Core	Core Project Team (*)										

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Tasks/Activities		Team Members									
		Project Manager (TBD)	Core Team (*)	App Dev Super	DEQ OIT SAB (Jares)	DEQ OIT Security (Jares)	DEQ BDB (Nagel)	System Analyst(s)	Lead Developer	Steering Committee	Program Mgr (Nolan & Dilliard)
ADB	OIT-Application Development Bureau (ADB)										
	Application Development Oversight										
	Application Standards Consultation	I/C	I/C	A/R	I/C	I/C	I	I	I	I	I
	Database Consultation	I/C	I/C	A/R	I/C	I/C	I	I	I	I	I
SAB	SAB										
	System Administration Oversight										
	Hardware/Software Procurement Consultation	I/C	I/C	I/C	A/R	I	I	I/C	I/C	I	I
	Hardware/Software Standards & Installation Oversight	I/C	I/C	I/C	A/R	I	I	I/C	I/C	I	I

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		Project Manager (TBD)	Core Team (*)	App Dev Super	DEQ OIT SAB (Jares)	DEQ OIT Security (Jares)	DEQ BDB (Nagel)	System Analyst(s)	Lead Developer	Steering Committee	Program Mgr (Nolan & Dilliard)
	Operations Manual	I/C	I/C	I/C	A	I	I	I/C	R	I	I
Security	Security										
	Security Standards Oversight										
	Physical (e.g., Wiring Closet, Server Room)	I	I	I	I	A/R	I	I	I	I	I
	Network	I	I	I	I	A/R	I	I	I	I	I
	Application Database	I/C	I	R	I	A	I	I	I/C	I	I/C
BDB	Business Development Bureau (BDB)										
	Contract, CEP, ITPR, & SOW										
	Draft/update/conduct review of documents as needed until Final	R	I/C	I/C	I/C	I/C	A/R	I/C	I/C	I	I/C
	Contract Management Checklist	R	I/C	I/C	I/C	I/C	A/R	I/C	I/C	I	I/C

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		Project Manager (TBD)	Core Team (*)	App Dev Super	DEQ OIT SAB (Jares)	DEQ OIT Security (Jares)	DEQ BDB (Nagel)	System Analyst(s)	Lead Developer	Steering Committee	Program Mgr (Nolan & Dilliard)
Systems Analyst	Systems Analyst (SA)										
	Functional Specifications										
	Business Process Flows	I/C	I	I/C	I	I	I	A/R	I/C	I	R
	Define Report Requirements	I/C	I	I/C	I	I	I	A/R	I/C	I	R
	Cross-Agency Applications	I/C	I	I/C	I	I	I	A/R	I/C	I	R
	Define Customer Care Plan	I/C	I	I/C	I	I	I	A/R	I/C	I	R
	Test Documentation and Coordination										
	Test Plan	I/C	I	I/C	I	I	I	A/R	R	I	R
	Test Cases	I/C	I	I/C	I	I	I	A/R	R	I	R
	Coordinate/Execute User Acceptance Test (UAT)	R/I/C	I	I/C	I	I	I	A/R	R	I	R

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		Project Manager (TBD)	Core Team (*)	App Dev Super	DEQ OIT SAB (Jares)	DEQ OIT Security (Jares)	DEQ BDB (Nagel)	System Analyst(s)	Lead Developer	Steering Committee	Program Mgr (Nolan & Dilliard)
	Analyze & Document UAT Results	I/C	I	I/C	I	I	I	A/R	R	I	R
	Training/Help										
	Online Help	I/C	I	I/C	I	I	I	A/R	R	I	R
	Training Plan	I/C	I	I/C	I	I/C	I	A	R/I/C	I	R
	Coordinate/Execute Training	I/C	I	I/C	I	I/C	I	R	R/I/C	I	A/R
Development	Technical Specifications										
	Solution Design Document (SDD)	I	I	I	I	I	I	I	A/R	I	I
	Coding	I	I	I	I	I	I	I	A/R	I	I
	Development of the Solution	I/C	I	I	I	I	I	I/C	A/R	I	I
	Testing										
	Conduct associated Unit Tests	I	I	I	I	I	I	I	A/R	I	I

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		Project Manager (TBD)	Core Team (*)	App Dev Super	DEQ OIT SAB (Jares)	DEQ OIT Security (Jares)	DEQ BDB (Nagel)	System Analyst(s)	Lead Developer	Steering Committee	Program Mgr (Nolan & Dilliard)
	Conduct Performance & Integration Tests and Report Results	I	I	I	I	I	I	I	A/R	I	I
	Certify Solution is ready for UAT	I	I	I	I	I	I	I	A/R	I	I
	Promote code from Beta to Production upon Certification	I	I	A/R	I	I	I	I	R	I	I
Steering Committee	Steering Committee										
	Approve M0	R	I/C	I/C	I/C	I/C	IS/C	I/C	I/C	A/R	I/C
	Approve M1	R	I/C	I/C	I/C	I/C	IS/C	I/C	I/C	A/R	I/C
	Approve M2	R	I/C	I/C	I/C	I/C	IS/C	I/C	I/C	A/R	I/C
	Approve M3	R	I/C	I/C	I/C	I/C	IS/C	I/C	I/C	A/R	I/C
	Approve M4	R	I/C	I/C	I/C	I/C	IS/C	I/C	I/C	A/R	I/C
	Approve M5	R	I/C	I/C	I/C	I/C	IS/C	I/C	I/C	A/R	I/C
	Approve M6	R	I/C	I/C	I/C	I/C	IS/C	I/C	I/C	A/R	I/C
Customer	Customer										
	Certify the requirements are	I	I	I	I	I	I	I	I	I	A/R

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		Project Manager (TBD)	Core Team (*)	App Dev Super	DEQ OIT SAB (Jares)	DEQ OIT Security (Jares)	DEQ BDB (Nagel)	System Analyst(s)	Lead Developer	Steering Committee	Program Mgr (Nolan & Dilliard)
	accurate and complete										
	Certify the design is accurate and complete	I	I	I	I	I	I	I	I	I	A/R
	Certify the solution is accurate and complete	I	I	I	I	I	I	I	I	I	A/R

* Core Team: Shelley Nolan, Andrea Vickory, Steve Martin, Jason Newton, Melissa Levens